



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 10**  
**OREGON OPERATIONS OFFICE**  
805 SW Broadway, Suite 500  
Portland, Oregon 97205

September 8, 2011

Bob Wyatt  
NW Natural & Chairman, Lower Willamette Group  
230 Northwest Second Avenue  
Portland, OR 97209

Re: Portland Harbor Superfund Site; Administrative Order on Consent for Remedial Investigation and Feasibility Study; Docket No. CERCLA-10-2001-0240  
2011 Smallmouth Bass Tissue Study

Dear Mr. Wyatt:

This is to follow up on our recent discussions regarding the collection of smallmouth bass tissue data in Portland Harbor in the fall 2011, and provide notice to the LWG that EPA is moving forward with data collection.

In accordance with the Administrative Order on Consent for the RI/FS, Section X, paragraph 3 "EPA may determine that in addition to tasks defined in the initially approved work plans, other work may be necessary to accomplish the objectives of the RI/FS. EPA may require Respondents to perform these response actions in addition to those required by this order." EPA has determined that collection of the additional smallmouth bass tissue data is required to provide information on concentration trends in resident fish tissue and to help support establishment of a baseline for monitoring remedy effectiveness, and that this information is therefore necessary accomplish the objectives of the RI/FS.

As you are aware, some funding from EPA Headquarters for collection of fish tissue in 2011 recently became available. In order to take advantage of these funds and because of the time constraints associated with the need to collect smallmouth bass in late summer/early fall in the lower Willamette River, EPA has chosen not to issue a directive to the LWG to perform this work. EPA did ask if the LWG could provide funding or technical support for the data collection and analysis. It is our understanding that the LWG will not provide funding or technical support for the fall 2011 sampling, but that individual members may step forward to support the work. It is also our understanding that the LWG will consider participating in data collection efforts that may be planned for 2012. One member of the LWG, the City of Portland, has agreed to provide funding and technical support to assist with the data collection and analysis this fall.

Due to the current funding constraints, the fall 2011 data collection will focus primarily on PCB contaminant levels in smallmouth bass tissue. This data will improve our understanding of current contaminant levels and trends in smallmouth bass tissue, support the evaluation of remedial alternatives and help establish a baseline for assessing changes in concentrations over time.

EPA intends to proceed with data collection the week of September 12, 2011. Please let us know as soon as possible if the LWG reconsiders its position regarding support for the fall 2011 data analysis. EPA will provide the results to the LWG after the validated data becomes available.

If you have any questions, please contact Chip Humphrey at (503) 326-2678 or Kristine Koch at (206) 553-6705. For legal questions, please contact Lori Cora at (206) 553-1115.

Sincerely,

Chip Humphrey  
EPA Remedial Project Manager

Kristine Koch  
EPA Remedial Project Manager

cc: Rick Applegate, City of Portland